

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

YVONNE MART FOX, GRANT NESHEIM,  
DANIELLE DUCKLEY, and SHELLEY  
KITSIS, individually and on behalf of all others  
similarly situated,

*Plaintiffs,*

v.

IOWA HEALTH SYSTEM, doing business as  
UNITYPOINT HEALTH, an Iowa non-profit  
corporation,

*Defendant.*

**Case No.: 3:18-cv-00327-JDP**

**JOINT NOTICE OF SETTLEMENT AND REQUEST TO SET PRELIMINARY  
APPROVAL BRIEFING SCHEDULE**

Plaintiffs Yvonne Mart Fox, Grant Nesheim, Danielle Duckley, and Shelly Kitsis (“Plaintiffs”) and Defendant Iowa Health System dba UnityPoint Health (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, hereby notify the Court that the Parties have reached a class-wide resolution of this matter and respectfully request that the Court vacate all pending deadlines and set a briefing schedule for the preliminary approval motion in light of the settlement. In support of the instant motion, the Parties state as follows:

1. On March 3, 2020, the Parties participated in a full-day mediation with the Honorable Judge Morton Denlow (Ret.) of JAMS in Chicago, Illinois.
2. The Parties were unable to reach a resolution of the matter at this mediation, but continued to engage in direct settlement negotiations.
3. The Parties participated in two additional telephonic mediation sessions with Judge Denlow on March 18, 2020 and March 20, 2020.
4. At the conclusion of the March 20 mediation session, Judge Denlow provided a

Mediator's Proposal on an unresolved term, which the Parties accepted on March 23, 2020.

5. The Parties finalized and executed a Term Sheet on April 10, 2020, and are working toward finalizing and executing a Class Action Settlement Agreement.

6. Economy would be served by vacating all existing dates as set forth in the Court's current case schedule, including all pretrial and trial dates, with the Court setting future dates as it deems necessary.

Accordingly, in the interest of preserving the Parties' and the Court's resources, the Parties respectfully request that the Court vacate all existing dates as set forth in the Court's Preliminary Pretrial Conference Order (Dkt. No. 68) and Order granting the Parties' Joint Motion to Continue Class Certification Deadlines (Dkt. No. 78).

The Parties also request that the Court set a deadline of July 8, 2020 for the Parties to file a motion for preliminary approval of the Class Action Settlement Agreement.

Dated: April 10, 2020

Respectfully submitted,

/s/ Casie D. Collignon (by permission)

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**CERTIFICATE OF SERVICE**

I, Cari C. Laufenberg hereby certify that, on April 10, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Western District of Wisconsin using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Cari Campen Laufenberg  
Cari Campen Laufenberg